

EXHIBIT A

RE: ICT v HP: Status Report

Received:  Wednesday, February 26, 2020 12:48 PM

From: Saso, Paul A. PSaso@gibbonslaw.com

To: Dimitry Joffe dimitry@joffe.law

CC: josh@joshmcguirelaw.com josh@joshmcguirelaw.com, Callaghan, Anthony ACallaghan@gibbonslaw.com, Michael Bunis mbunis@choate.com, gedgarton@choate.com gedgarton@choate.com, kquigley@choate.com kquigley@choate.com

Dimitry,

Defendants' position is that fact witness depositions (other than for Family Plaintiffs) should commence after resolution of the motions for partial summary judgment. The parties are in agreement that the deposition and medical/psychological examination of Caroline Marafao Cheng may proceed during the pendency of the motions.

In addition to submitting the expert reports to the Court as exhibits to the Status Report, Defendants propose also submitting the transcripts of the experts' depositions. Please let us know if you agree with this proposal.

Regards,

Paul

Paul A. Saso, Esq. / Director

Gibbons P.C., One Pennsylvania Plaza, 37th Floor, New York, New York 10119
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From: Dimitry Joffe <dimitry@joffe.law>

Sent: Wednesday, February 26, 2020 11:47 AM

To: Saso, Paul A. <PSaso@gibbonslaw.com>

Cc: josh@joshmcguirelaw.com; Callaghan, Anthony <ACallaghan@gibbonslaw.com>; Michael Bunis <mbunis@choate.com>; gedgarton@choate.com; kquigley@choate.com

Subject: Re: ICT v HP: Status Report

Paul,

Plaintiffs do plan to file their own motion, and are proposing that depositions can proceed while the motions are pending.

As far as the deposition schedule generally, the entry of Chinese residents to the US is currently suspended due to the coronavirus; I propose we schedule depositions of plaintiffs who are in the US (Alex, Jade and Caroline) and of defendants first, and of the family plaintiffs, Jason and Cathy when the travel ban is lifted, unless you have other suggestions.

I will follow up with the list of the proposed deponents later in the day.

Regards,

Dimitry

This email is secured.

----- Original Message -----

On Tuesday, February 25, 2020 4:26 PM, Saso, Paul A. <PSaso@gibbonslaw.com> wrote:

Dimitry,

I spoke to Josh at this afternoon's deposition and he tells me you will be providing Plaintiffs' portions of the Joint Status Report. Can the parties exchange lists of proposed deponents by tomorrow at noon so that everyone will have enough time to determine if they are asserting any objections?

Please also let me know if Plaintiffs are proposing that any depositions take place during the pendency of the motion(s) for summary judgment and whether Plaintiffs intend on filing a motion of their own. Also, let me know if you have a proposal for the schedule for depositions more generally.

Regards,

Paul

Sent from my iPhone



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